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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS MOTION IN LIMINE  
NO. 23**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to Seal  
7 Portions of their Motion in Limine No. 23 and Waymo’s Opposition thereto (Dkt. 1553) (the  
8 “Administrative Motion”). The Administrative Motion seeks an order sealing highlighted portions of  
9 Defendants’ Motion in Limine No. 23 (“MIL 23”) and Exhibits 1, 2, 9, 11, and 15 to the Goodman  
10 Declaration, as well as Waymo’s Opposition to Motion in Limine No. 23 (“MIL 23 Opposition”) and  
11 Exhibits A-H to the Nardinelli Declaration. Of these, only Goodman Declaration Ex. 11 contains  
12 Waymo confidential information.

13 3. Goodman Declaration Ex. 11 (entire document) contains, references, and/or describes  
14 Waymo’s highly confidential trade secrets. I understand that this information is maintained as secret  
15 by Waymo (Dkt. 25-47) and is valuable as trade secret to Waymo’s business (Dkt. 25-31). The public  
16 disclosure of this information would give Waymo’s competitors access to in-depth descriptions—and  
17 analysis—of the functionality of Waymo’s autonomous vehicle system. If such information were  
18 made public, I understand that Waymo’s competitive standing would be significantly harmed.  
19 Waymo’s request to seal is narrowly tailored to only the confidential information.

20 4. Waymo’s request to seal is narrowly tailored to those portions of Goodman Declaration  
21 Ex. 11 that merit sealing.  
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1  
2 I declare under penalty of perjury under the laws of the State of California and the United  
3 States of America that the foregoing is true and correct, and that this declaration was executed in San  
4 Francisco, California, on September 18, 2017.

5  
6 By /s/ Felipe Corredor  
7 Felipe Corredor  
8 Attorneys for WAYMO LLC  
9

10 **ATTESTATION**

11 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
12 document has been obtained from Felipe Corredor.  
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14 By: /s/ Charles K. Verhoeven  
15 Charles K. Verhoeven  
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